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7 Counsel For Official Committee of Unsecured Creditors

9  
10 **UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

11 In re:

12 THE LITIGATION PRACTICE GROUP,  
13 P.C.,

14 Debtor.

Chapter 11

Case No. 8:23-bk-10571-SC

15 **STIPULATION TO EXTEND DEADLINE**  
**FOR CHAPTER 11 TRUSTEE TO FILE**  
**A PLAN AND DISCLOSURE**  
**STATEMENT**

1 The Official Committee of Unsecured Creditors (the “Committee”) of The Litigation Practice  
2 Group P.C., Richard A. Marshack, in his capacity as the chapter 11 trustee of The Litigation Practice  
3 Group P.C. (the “Trustee” and, together with the Committee, the “Parties”), stipulate and agree as  
4 follows (the “Stipulation”).

## RECITALS

6           A.       On March 20, 2023 (the “Petition Date”), The Litigation Practice Group P.C. (the  
7           “Debtor”), filed a voluntary petition under chapter 11 of title 11 of the United States Code, 11 U.S.C.  
8           §§ 101 *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Central District  
9           of California (the “Court”), commencing the above-captioned bankruptcy case (the “Bankruptcy  
10          Case”).

B. On May 8, 2023, the Court entered an order [Docket No. 65] approving the appointment of the Trustee.

13       C.     On June 23, 2023, the Office of the United States Trustee appointed [Docket No. 134]  
14 the Committee, which was amended [Docket No. 157] to increase the number of Committee members  
15 on June 29, 2023.

16 D. On August 2, 2023, the Court entered an order [Docket No. 352] (the “Sale Order”)  
17 approving the sale of certain assets, pursuant to that certain *Agreement of Purchase and Sale and*  
18 *Joint Escrow Instructions* (the “APA”).

19       E.      On August 18, 2023, the Committee and the Trustee initiated a standing weekly case  
20 negotiation and status meeting among their respective professionals and the Trustee.

21 F. On August 25, 2023, the Court entered a *Scheduling Order After Status Conference*  
22 [Docket No. 452] (the “Scheduling Order”) setting October 24, 2023, as the deadline for the Trustee  
23 to file and serve a chapter 11 plan and related disclosure statement (the “Filing Deadline”).

24       G. Since the entry of the Scheduling Order, the Parties have been engaged in ongoing and  
25 substantive negotiations with the aim of filing a joint chapter 11 plan of liquidation and related  
26 disclosure statement. Among other things, the Parties have engaged in substantive negotiations and  
27 discussions concerning a potential joint plan during their weekly status meetings and in separate  
28 meetings intended to address specific areas of concern related to such joint plan. Moreover, the

1 Parties continue to evaluate, among other things, post-closing financial reporting, pursuant to audit  
2 requests submitted by the Committee under the APA, necessary to complete a fulsome plan analysis,  
3 including a liquidating analysis and plan projections. The Parties have made material progress toward  
4 negotiating a joint plan and disclosure statement; however, the Parties have determined that further  
5 negotiations and financial information are required.

6 H. In light of the foregoing, the Parties have agreed that it is in the best interests of the  
7 estate and the Parties' further negotiations to agree to an extension of the Filing Deadline to provide  
8 additional time for the Parties to continue efforts to negotiate a joint plan and disclosure statement.

9 **STIPULATION**

10 NOW, THEREFORE, based on the foregoing, the Parties agree and stipulate as follows:

11 1. The Parties restate and incorporate the foregoing Recitals set forth above.  
12 2. The Filing Deadline for the Trustee to file a chapter 11 plan and disclosure statement  
13 shall be extended from October 24, 2023, through and including December 5, 2023.

14 DATED this 16th day of October 2023.

15 **FOX ROTHSCHILD LLP**

16 By: Michael Sweet

17 Michael A. Sweet (Bar No. 184345)  
18 Keith C. Owens (Bar No. 184841)  
19 Nicholas A. Koffroth (Bar No. 287854)  
Constellation Place  
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20 Los Angeles, California 90067  
21 *Counsel for the Committee*

**MARSHACK WOOD HAYS LLP**

By: D. Edward Hays  
D. Edward Hays (Bar No. 162507)  
Laila Masud (Bar No. 311731)  
870 Roosevelt  
Irvine, California 92620  
*Counsel for Trustee*

## **PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: STIPULATION TO EXTEND DEADLINE FOR CHAPTER 11 TRUSTEE TO FILE A PLAN AND DISCLOSURE STATEMENT on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 10/17/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
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  - **Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
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  - **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
  - **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
  - **Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC\_KM\_ECF\_SMO@bclplaw.com
  - **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com;eweiman@wrslawyers.com

**2. SERVED BY UNITED STATES MAIL:** On 10/17/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

## Debtor

The Litigation Practice Group P.C.  
17542 17th St., Suite 100  
Tustin, CA 92780

**See attached for additional parties**

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on October 17, 2023, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson  
United States Bankruptcy Court, Central District of California  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/17/2023

Kimberly Hoang

Date

*Printed Name*

/s/ Kimberly Hoang

*Signature*

1                   **Additional Parties Served by U.S. Mail**

2                   **Creditors who have the 20 largest unsecured claims**

3                   Debt Validation Fund II, LLC  
5075 Lower Valley Road,  
4                   Atglen, PA 19310

5                   MC DVI Fund 1, LLC; MC  
DVI Fund 2, LLC  
6                   598 Cottonwood Dr.,  
Glenview, IL 60026

7                   Validation Partners LLC  
8                   1300 Sawgrass Pkwy, Ste. 110  
Sunrise, FL 33323

9                   Marich Bein LLC  
10                  99 Wall Street, Ste 2669  
New York, NY 10005

11                  Business Centers of America  
12                  1100 Sir Francis Drake Blvd,  
Ste 1, Kentfield, CA 94904

13                  JP Morgan Chase  
14                  3 Park Plaza, Ste 900  
Irvine, CA 92614

15                  CA Franchise Tax Board  
16                  PO Box 942857  
Sacramento, CA 94257-0511

17                  Outsource Accelerator Ltd  
18                  City Marque Limited  
Unit 8801-2 Bldg. 244-248  
19                  Des Voeux Rd.  
Central Hong Kong

20                  Collaboration Advisors  
21                  400 Dorla Court  
Zephyr Cove, NV 89448

22                  Anthem Blue Cross  
23                  PO Box 511300  
Los Angeles, CA 90051-7855

24                  Azevedo Solutions Groups, Inc.  
420 Adobe Canyon Rd.  
Kenwood, CA 95452

25                  Debt Pay Pro  
1900 E Golf Road, Suite 550  
Schaumburg, IL 60173

1 Sharp Business Systems  
2 8670 Argent St  
Santee, CA 92071

3 Tustin Executive Center  
4 1630 S Sunkist Street, Ste A  
Anaheim, CA 92806

5 Exela Enterprise Solutions  
2701 E. Grauwylde Road  
6 Irving, TX 75061

7 Netsuite-Oracle  
2300 Oracle Way  
8 Austin, TX 78741

9 Credit Reporting Service Inc  
548 Market St, Suite 72907  
10 San Francisco, CA 94104-5401

11 Document Fulfillment Services  
2930 Ramona Ave #100  
12 Sacramento, CA 95826

13 Executive Center LLC  
5960 South Jones Blvd  
14 Las Vegas, NV 89118

15 LexisNexus  
15500 B Rockfield Blvd  
16 Irvine, CA 92618

17  
**Secured Creditors**

18 Diverse Capital LLC  
19 323 Sunny Isles Blvd., Suite 503  
Sunny Isles, FL 33154

20 City Capital NY  
21 1135 Kane Concourse  
Bay Harbour Islands, FL 33154

22 Counsel for secured creditor Fundura Capital Group  
23 Mitchell B. Ludwig  
Knapp, Petersen & Clarke  
24 550 North Brand Blvd., Suite 1500  
Glendale, CA 91203

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